

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**DEFENDANT KEBE STUDIOS LLC’S ANSWER AND AFFIRMATIVE
DEFENSES TO PLAINTIFF’S SECOND AMENDED COMPLAINT**

COMES NOW Kebe Studios LLC (hereinafter referred to as “Kebe Studios”), by and through undersigned Counsel, and hereby files this Answer and Affirmative Defenses to Plaintiff’s Second Amended Complaint, showing this Honorable Court as follows:

FIRST DEFENSE

Plaintiff’s Second Amended Complaint fails to state any claim upon which relief can be granted and, therefore, the same should be dismissed.

SECOND DEFENSE

Plaintiff’s Second Amended Complaint fails to plead each essential element for a viable claim of Slander *Per Se* under Georgia law and, therefore, the same should be dismissed.

THIRD DEFENSE

Plaintiff's Second Amended Complaint fails to plead each essential element for a viable claim of Slander under Georgia law and, therefore, the same should be dismissed.

FOURTH DEFENSE

Plaintiff's Second Amended Complaint fails to plead each essential element for a viable claim of Libel *Per Se* under Georgia law and, therefore, the same should be dismissed.

FIFTH DEFENSE

Plaintiff's Second Amended Complaint fails to plead each essential element for a viable claim of Defamation under Georgia law and, therefore, the same should be dismissed.

SIXTH DEFENSE

Plaintiff's Second Amended Complaint fails to plead each essential element for a viable claim of Invasion of Privacy - False Light under Georgia law and, therefore, the same should be dismissed.

SEVENTH DEFENSE

Plaintiff's Second Amended Complaint fails to plead each essential element for a viable claim of Intentional Infliction of Emotional Distress under Georgia law and, therefore, the same should be dismissed.

EIGHTH DEFENSE

Plaintiff's Second Amended Complaint fails to plead with particularity her entitlement to punitive damages, as required by O.C.G.A. § 51-12-5.1, and, therefore, Plaintiff is not entitled to, and should be prohibited from recovering, punitive damages.

NINTH DEFENSE

Plaintiff's Second Amended Complaint fails to plead each essential element in order to recover an award of punitive damages under Georgia law and, therefore, the same should be dismissed.

TENTH DEFENSE

Plaintiff's Second Amended Complaint fails to establish her entitlement to Attorneys' Fees, as required by O.C.G.A. § 13-6-11, and, therefore, Plaintiff is not entitled to, and should be prohibited from recovering, attorneys' fees.

ELEVENTH DEFENSE

Plaintiff's Second Amended Complaint fails to establish her entitlement to Litigation Expenses, as required by O.C.G.A. § 13-6-11, and, therefore, Plaintiff is not entitled to, and should be prohibited from recovering, litigation expenses.

TWELFTH DEFENSE

Plaintiff's claim for injunctive relief is not proper before this Court. Furthermore, Plaintiff's Second Amended Complaint fails to demonstrate the necessity for injunctive relief as required by Georgia law. For the foregoing reasons, Plaintiff's claim for injunctive relief should be dismissed.

THIRTEENTH DEFENSE

Pursuant to O.C.G.A. § 51-5-6, "[t]he truth of the charge made may always be proved in justification of an alleged libel or slander."

FOURTEENTH DEFENSE

Pursuant to O.C.G.A. § 51-5-7, the statements giving rise to this action, as alleged in Plaintiff's Second Amended Complaint, are privileged communications because Plaintiff is a public figure.

FIFTEENTH DEFENSE

Kebe Studios incorporates all affirmative defenses herein.

SIXTEENTH DEFENSE

Without waving any of the foregoing defenses, Kebe Studios answers the specific allegations of Plaintiff's Second Amended Complaint as follows:

NATURE OF THE CASE

1. Paragraph 1 contains conclusions of law regarding diversity jurisdiction, to which no response is required. To the extent a response is deemed required, Kebe Studios denies.

PARTIES

2. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 2 and, therefore, these allegations are denied as alleged.

3. Kebe Studios admits the allegations contained in Paragraph 3.

4. Kebe Studios admits that it is a Georgia limited liability company and denies the remaining allegations contained in Paragraph 4.

5. Kebe Studios denies the allegations contained in Paragraph 5.

JURISDICTION AND VENUE

6. Paragraph 6 contains conclusions of law regarding subject-matter jurisdiction, to which no response is required. To the extent a response is deemed required, Kebe Studios denies.

7. Paragraph 7 contains conclusions of law regarding personal jurisdiction, to which no response is required. To the extent a response is deemed required, Kebe Studios denies.

8. Paragraph 8 contains conclusions of law regarding venue, to which no response is required. To the extent a response is deemed required, Kebe Studios denies.

FACTUAL BACKGROUND

9. Kebe Studios admits the allegations contained in Paragraph 9.

10. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 10 and, therefore, these allegations are denied as alleged.

11. Kebe Studios admits the allegations contained in Paragraph 11.

12. Kebe Studios denies the allegations contained in Paragraph 12.

13. Kebe Studios admits the allegations contained in Paragraph 13.

14. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 14 and, therefore, these allegations are denied as alleged.

15. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 15 and, therefore, these allegations are denied as alleged.

16. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 16 and, therefore, these allegations are denied as alleged.

17. Kebe Studios admits the allegations contained in Paragraph 17.

18. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 18 and, therefore, these allegations are denied as alleged.

19. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 19 and, therefore, these allegations are denied as alleged.

20. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 20 and, therefore, these allegations are denied as alleged.

21. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 21 and, therefore, these allegations are denied as alleged.

22. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 22 and, therefore, these allegations are denied as alleged.

23. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 23 and, therefore, these allegations are denied as alleged.

24. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 24 and, therefore, these allegations are denied as alleged.

25. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 25 and, therefore, these allegations are denied as alleged.

26. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 26 and, therefore, these allegations are denied as alleged.

27. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 27 and, therefore, these allegations are denied as alleged.

28. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 28 and, therefore, these allegations are denied as alleged.

29. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 29 and, therefore, these allegations are denied as alleged.

30. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 30 and, therefore, these allegations are denied as alleged.

31. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 31 and, therefore, these allegations are denied as alleged.

32. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 32 and, therefore, these allegations are denied as alleged.

33. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 33 and, therefore, these allegations are denied as alleged.

34. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 34 and, therefore, these allegations are denied as alleged.

35. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 35 and, therefore, these allegations are denied as alleged.

36. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 36 and, therefore, these allegations are denied as alleged.

37. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 37 and, therefore, these allegations are denied as alleged.

38. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 38 and, therefore, these allegations are denied as alleged.

39. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 39 and, therefore, these allegations are denied as alleged.

40. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 40 and, therefore, these allegations are denied as alleged.

41. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 41 and, therefore, these allegations are denied as alleged.

42. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 42 and, therefore, these allegations are denied as alleged.

43. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 43 and, therefore, these allegations are denied as alleged.

44. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 44 and, therefore, these allegations are denied as alleged.

45. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 45 and, therefore, these allegations are denied as alleged.

46. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 46 and, therefore, these allegations are denied as alleged.

47. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 47 and, therefore, these allegations are denied as alleged.

48. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 48 and, therefore, these allegations are denied as alleged.

49. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 49 and, therefore, these allegations are denied as alleged.

50. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 50 and, therefore, these allegations are denied as alleged.

51. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 51 and, therefore, these allegations are denied as alleged.

52. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 52 and, therefore, these allegations are denied as alleged.

53. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 53 and, therefore, these allegations are denied as alleged.

54. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 54 and, therefore, these allegations are denied as alleged.

55. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 55 and, therefore, these allegations are denied as alleged.

56. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 56 and, therefore, these allegations are denied as alleged.

57. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 57 and, therefore, these allegations are denied as alleged.

58. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 58 and, therefore, these allegations are denied as alleged.

59. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 59 and, therefore, these allegations are denied as alleged.

60. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 60 and, therefore, these allegations are denied as alleged.

61. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 61 and, therefore, these allegations are denied as alleged.

62. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 62 and, therefore, these allegations are denied as alleged.

63. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 63 and, therefore, these allegations are denied as alleged.

64. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 64 and, therefore, these allegations are denied as alleged.

65. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 65 and, therefore, these allegations are denied as alleged.

66. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 66 and, therefore, these allegations are denied as alleged.

67. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 67 and, therefore, these allegations are denied as alleged.

68. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 68 and, therefore, these allegations are denied as alleged.

69. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 69 and, therefore, these allegations are denied as alleged.

70. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 70 and, therefore, these allegations are denied as alleged.

71. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 71 and, therefore, these allegations are denied as alleged.

72. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 72 and, therefore, these allegations are denied as alleged.

73. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 73 and, therefore, these allegations are denied as alleged.

74. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 74 and, therefore, these allegations are denied as alleged.

75. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 75 and, therefore, these allegations are denied as alleged.

76. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 76 and, therefore, these allegations are denied as alleged.

77. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 77 and, therefore, these allegations are denied as alleged.

78. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 78 and, therefore, these allegations are denied as alleged.

79. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 79 and, therefore, these allegations are denied as alleged.

80. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 80 and, therefore, these allegations are denied as alleged.

81. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 81 and, therefore, these allegations are denied as alleged.

82. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 82 and, therefore, these allegations are denied as alleged.

83. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 83 and, therefore, these allegations are denied as alleged.

84. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 84 and, therefore, these allegations are denied as alleged.

85. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 85 and, therefore, these allegations are denied as alleged.

86. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 86 and, therefore, these allegations are denied as alleged.

87. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 87 and, therefore, these allegations are denied as alleged.

88. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 88 and, therefore, these allegations are denied as alleged.

89. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 89 and, therefore, these allegations are denied as alleged.

90. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 90 and, therefore, these allegations are denied as alleged.

91. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 91 and, therefore, these allegations are denied as alleged.

92. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 92 and, therefore, these allegations are denied as alleged.

93. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 93 and, therefore, these allegations are denied as alleged.

94. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 94 and, therefore, these allegations are denied as alleged.

95. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 95 and, therefore, these allegations are denied as alleged.

96. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 96 and, therefore, these allegations are denied as alleged.

97. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 97 and, therefore, these allegations are denied as alleged.

98. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 98 and, therefore, these allegations are denied as alleged.

COUNT I
(Slander Per Se Against Defendants)

99. Kebe Studios incorporates as if fully set forth herein the responses to Paragraphs 1 through 98 of Plaintiff's Second Amended Complaint.

100. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 100 and, therefore, these allegations are denied as alleged.

101. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 101 and, therefore, these allegations are denied as alleged.

102. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 102 and, therefore, these allegations are denied as alleged.

103. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 103 and, therefore, these allegations are denied as alleged.

104. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 104 and, therefore, these allegations are denied as alleged.

105. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 105 and, therefore, these allegations are denied as alleged.

106. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 106 and, therefore, these allegations are denied as alleged.

107. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 107 and, therefore, these allegations are denied as alleged.

108. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 108 and, therefore, these allegations are denied as alleged.

109. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 109 and, therefore, these allegations are denied as alleged.

110. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 110 and, therefore, these allegations are denied as alleged.

111. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 111 and, therefore, these allegations are denied as alleged.

112. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 112 and, therefore, these allegations are denied as alleged.

113. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 113 and, therefore, these allegations are denied as alleged.

114. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 114 and, therefore, these allegations are denied as alleged.

115. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 115 and, therefore, these allegations are denied as alleged.

116. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 116 and, therefore, these allegations are denied as alleged.

117. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 117 and, therefore, these allegations are denied as alleged.

118. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 118 and, therefore, these allegations are denied as alleged.

119. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 119 and, therefore, these allegations are denied as alleged.

120. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 120 and, therefore, these allegations are denied as alleged.

121. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 121 and, therefore, these allegations are denied as alleged.

122. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 122 and, therefore, these allegations are denied as alleged.

123. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 123 and, therefore, these allegations are denied as alleged.

124. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 124 and, therefore, these allegations are denied as alleged.

125. Kebe Studios denies the allegations contained in Paragraph 125.

126. Kebe Studios denies the allegations contained in Paragraph 126.

127. Kebe Studios denies the allegations contained in Paragraph 127.

COUNT II
(Slander Against Defendants)

128. Kebe Studios incorporates as if fully set forth herein the responses to Paragraphs 1 through 127 of Plaintiff's Second Amended Complaint.

129. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 129 and, therefore, these allegations are denied as alleged.

130. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 130 and, therefore, these allegations are denied as alleged.

131. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 131 and, therefore, these allegations are denied as alleged.

132. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 132 and, therefore, these allegations are denied as alleged.

133. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 133 and, therefore, these allegations are denied as alleged.

134. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 134 and, therefore, these allegations are denied as alleged.

135. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 135 and, therefore, these allegations are denied as alleged.

136. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 136 and, therefore, these allegations are denied as alleged.

137. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 137 and, therefore, these allegations are denied as alleged.

138. Kebe Studios denies the allegations contained in Paragraph 138.

139. Kebe Studios denies the allegations contained in Paragraph 139.

140. Kebe Studios denies the allegations contained in Paragraph 140.

COUNT III
(Libel Per Se Against Defendants)

141. Kebe Studios incorporates as if fully set forth herein the responses to Paragraphs 1 through 140 of Plaintiff's Second Amended Complaint.

142. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 142 and, therefore, these allegations are denied as alleged.

143. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 143 and, therefore, these allegations are denied as alleged.

144. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 144 and, therefore, these allegations are denied as alleged.

145. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 145 and, therefore, these allegations are denied as alleged.

146. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 146 and, therefore, these allegations are denied as alleged.

147. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 147 and, therefore, these allegations are denied as alleged.

148. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 148 and, therefore, these allegations are denied as alleged.

149. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 149 and, therefore, these allegations are denied as alleged.

150. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 150 and, therefore, these allegations are denied as alleged.

151. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 151 and, therefore, these allegations are denied as alleged.

152. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 152 and, therefore, these allegations are denied as alleged.

153. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 153 and, therefore, these allegations are denied as alleged.

154. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 154 and, therefore, these allegations are denied as alleged.

155. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 155 and, therefore, these allegations are denied as alleged.

156. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 156 and, therefore, these allegations are denied as alleged.

157. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 157 and, therefore, these allegations are denied as alleged.

158. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 158 and, therefore, these allegations are denied as alleged.

159. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 159 and, therefore, these allegations are denied as alleged.

160. Kebe Studios denies the allegations contained in Paragraph 160.

161. Kebe Studios denies the allegations contained in Paragraph 161.

162. Kebe Studios denies the allegations contained in Paragraph 162.

COUNT IV
(Invasion of Privacy – False Light Against Defendants)

163. Kebe Studios incorporates as if fully set forth herein the responses to Paragraphs 1 through 162 of Plaintiff's Second Amended Complaint.

164. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 164 and, therefore, these allegations are denied as alleged.

165. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 165 and, therefore, these allegations are denied as alleged.

166. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 166 and, therefore, these allegations are denied as alleged.

167. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 167 and, therefore, these allegations are denied as alleged.

168. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 168 and, therefore, these allegations are denied as alleged.

169. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 169 and, therefore, these allegations are denied as alleged.

170. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 170 and, therefore, these allegations are denied as alleged.

171. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 171 and, therefore, these allegations are denied as alleged.

172. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 172 and, therefore, these allegations are denied as alleged.

173. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 173 and, therefore, these allegations are denied as alleged.

174. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 174 and, therefore, these allegations are denied as alleged.

175. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 175 and, therefore, these allegations are denied as alleged.

176. Kebe Studios denies the allegations contained in Paragraph 176.

177. Kebe Studios denies the allegations contained in Paragraph 177.

178. Kebe Studios denies the allegations contained in Paragraph 178.

COUNT V
(Intentional Infliction of Emotional Distress)

179. Kebe Studios incorporates as if fully set forth herein the responses to Paragraphs 1 through 178 of Plaintiff's Second Amended Complaint.

180. Kebe Studios denies the allegations contained in Paragraph 180.

181. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 181 and, therefore, these allegations are denied as alleged.

182. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 182 and, therefore, these allegations are denied as alleged.

183. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 183 and, therefore, these allegations are denied as alleged.

184. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 184 and, therefore, these allegations are denied as alleged.

185. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 185 and, therefore, these allegations are denied as alleged.

186. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 186 and, therefore, these allegations are denied as alleged.

187. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 187 and, therefore, these allegations are denied as alleged.

188. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 188 and, therefore, these allegations are denied as alleged.

189. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 189 and, therefore, these allegations are denied as alleged.

190. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 190 and, therefore, these allegations are denied as alleged.

191. Kebe Studios denies the allegations contained in Paragraph 191.

192. Kebe Studios denies the allegations contained in Paragraph 192.

193. Kebe Studios denies the allegations contained in Paragraph 193.

COUNT VI
(Punitive Damages Pursuant to O.C.G.A. § 51-12-5.1)

194. Kebe Studios incorporates as if fully set forth herein the responses to Paragraphs 1 through 193 of Plaintiff's Second Amended Complaint.

195. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 195 and, therefore, these allegations are denied as alleged.

196. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 196 and, therefore, these allegations are denied as alleged.

197. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 197 and, therefore, these allegations are denied as alleged.

198. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 198 and, therefore, these allegations are denied as alleged.

COUNT VII
(Attorneys' Fees and Litigation Expenses Pursuant to O.C.G.A. § 13-6-11)

199. Kebe Studios incorporates as if fully set forth herein the responses to Paragraphs 1 through 198 of Plaintiff's Second Amended Complaint.

200. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 200 and, therefore, these allegations are denied as alleged.

201. Kebe Studios lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 201 and, therefore, these allegations are denied as alleged.

PRAYER FOR RELIEF

The remainder of Plaintiff's Second Amended Complaint contains the Plaintiff's Prayer for Relief, to which no response is required. To the extent this paragraph is deemed to contain factual allegations, Kebe Studios denies those allegations contained in subparagraphs (a) through (g) and denies that Plaintiff is entitled to any relief whatsoever.

WHEREFORE, having fully answered, Kebe Studios requests judgment and relief against Plaintiff as follows:

- (a) that this Court dismiss Plaintiff's Second Amended Complaint with prejudice;
- (b) that this Court order Plaintiff to pay for all of Kebe Studios' costs, expenses, and attorneys' fees in defending this action;
- (c) that Kebe Studios have a trial by jury; and
- (d) for such other and further relief as this Court deems just and proper.

Respectfully submitted this 15th day of February, 2021.

/s/Olga Izmaylova
olga@silawatl.com
Georgia State Bar No. 666858

/s/Sadeer Sabbak
ssabbak@silawatl.com
Georgia State Bar No. 918493

SABBAK & IZMAYLOVA, P.C.
1875 Old Alabama Road
Suite 760
Roswell, Georgia 30076
p. (404) 793-7773
f. (678) 878-4911

Attorneys for Kebe Studios LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2021, I electronically filed the foregoing DEFENDANT KEBE STUDIOS LLC'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S SECOND AMENDED COMPLAINT with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/Olga Izmaylova
olga@silawatl.com
Georgia State Bar No. 666858

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